



ELECTRONICALLY FILED  
6/5/2020 3:45 PM  
29-DV-2020-900155.00  
CIRCUIT COURT OF  
ELMORE COUNTY, ALABAMA  
MICHAEL DOZIER, CLERK

IN THE DISTRICT COURT OF ELMORE COUNTY, ALABAMA

JOHN WILLIAMS

PLAINTIFF,

vs.

ENHANCED RECOVERY COMPANY,  
LLC and CHARTER  
COMMUNICATIONS, INC.

DEFENDANTS.

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

CASE NO. DV-2020 - \_\_\_\_\_

PLAINTIFF'S COMPLAINT

COMES NOW JOHN WILLIAMS (or "Plaintiff"), and makes this following complaint against ENHANCED RECOVERY COMPANY, LLC and CHARTER COMMUNICATIONS, INC. (hereinafter referred to as the "Defendants"). The causes of action set forth herein arise out of the Defendants seeking to collect a debt from Plaintiff that they allege is owed by Plaintiff to Charter Communications, Inc. for cable services even though Plaintiff has never used Charter Communications, Inc. and then publishing and reporting false information on Plaintiff's credit report which has caused the Plaintiff significant damages.

1. The Plaintiff, JOHN WILLIAMS, is over the age of 18 years old and is a resident of Elmore County, Alabama.

2. Defendants, CHARTER COMMUNICATIONS, INC. and ENHANCED RECOVERY COMPANY, LLC are both foreign business entities doing business in Alabama.

COUNT ONE – DEFAMATION

3. Defendants have falsely reported on Plaintiff's credit bureau report that he has a delinquent account that has been placed for collection even though Plaintiff does not and has never used Charter cable at his current residence. The information reported by the Defendants on Plaintiff's credit bureau is an intentional false communication published by the Defendants that has harmed Plaintiff's good name and business in the community. Plaintiff is the owner of Mortgage Corporation of the South (or "MCS") and this negative credit information came up when he was renewing his line of credit at the bank and the Plaintiff is also on the Board of Directors and loan committee of the local bank in Wetumpka and he must be in compliance at all times with Regulation O.

WHEREFORE, Plaintiff prays that this Honorable Court will award him

\$20,000.00 in compensatory damages against the Defendants jointly and severally as a result of the Defendants defamation of his good name and reputation and business.

**COUNT TWO – LIBEL**

4. Plaintiff adopts and re-alleges paragraphs 1 through 3 as if fully set out herein.

5. The Defendants, published false and defamatory information about the Plaintiff, namely that he has an unpaid debt that he owes to Charter Communications, Inc., that has been placed in collections. Plaintiff does not owe Charter Communications, Inc. any sums whatsoever. The publication of said false information has severely damaged Plaintiff and his business and exposed him to ridicule. Plaintiff is the owner of Mortgage Corporation of the South (or “MCS”) and this negative credit information came up when he was renewing his line of credit at the bank and the Plaintiff is also on the Board of Directors and loan committee of the local bank in Wetumpka and he must be in compliance at all times with Regulation O.

WHEREFORE, Plaintiff prays that this Honorable Court will award him \$20,000.00 in compensatory damages as a result of the Defendants libel of his good name and reputation and business.

This the 4th day of June, 2020.

/s/ Burt W. Newsome

Burt W. Newsome

Attorney For Plaintiff

NEWSOME LAW, LLC

Post Office Box 382753

Birmingham, AL 35238

Telephone: (205) 747-1970

Fax: (205) 747-1971

email: burt@newsomelawllc.com

Plaintiff's Address

John Williams  
c/o Newsome Law, LLC  
P.O. Box 382753  
Birmingham, AL 35238

Defendants' Addresses

CHARTER COMMUNICATIONS, INC.  
c/o Corporation Service Company, Inc., its Registered Agent  
641 South Lawrence Street  
Montgomery, AL 36104

ENHANCED RECOVERY COMPANY, LLC  
c/o Corporation Service Company, Inc., its Registered Agent  
641 South Lawrence Street  
Montgomery, AL 36104